



C-20-0287
U.S. Department of Housing and Urban
Development

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

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Broad-Level Tiered Environmental Review for Activity/Project that is Exempt or Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR Part 58.35(a) and 58.35(b)

Project Information

Project Name: Environmental Review Record for combined City of Knoxville Housing and Neighborhood Development (HND) and Knox County Community Development (KCCD)

Responsible Entity (RE): Mayor Indya Kincannon (City of Knoxville) / Mayor Glenn Jacobs (KCCD)

State/Local Identifier: City of Knoxville / Knox County, Tennessee

RE Preparer:

Certifying Officer: Mayor Indya Kincannon (City of Knoxville) / Mayor Glenn Jacobs (KCCD)

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Ms. Linda Rust, Community Development Administrator
Housing and Neighborhood Development (HND)
400 Main Street, Suite 515
Knoxville, TN 37902
865.215.2357

Mr. Iain Christie, Grants Program Manager, KCCD
400 West Main Street, Suite 630
Knoxville, TN 37902
865.215.3964

Consultant (if applicable):

Point of Contact: Jessica Lindbom, Project Manager, Quantum Environmental and Engineering Services, LLC

Project Location: City and County-wide projects

Additional Location Information:

Direct Comments to: Ms. Linda Rust, HND and/or Mr. Iain Christie, KCCD

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The City of Knoxville and Knox County have each developed Consolidated Plans (2020-2024) to address affordable housing and non-housing community development needs in their respective jurisdictions. The submission of a Consolidated Plan is a requirement of the U.S. Department of Housing and Urban Development (HUD) for a jurisdiction to receive funding under its Community Development Block Grant (CDBG), HOME Investment Partnerships Act (HOME), and Emergency Solutions Grant (ESG) programs. These funds are used to support affordable housing and non-housing community development activities focused on the needs of low- to moderate-income (LMI) people and households in each jurisdiction. These activities may include: 1) Increasing and preserving affordable housing, including homeownership and rental housing opportunities, supportive housing for people with special needs, and energy conservation; 2) Neighborhood stabilization and revitalization, including maintenance of previously acquired blighted properties awaiting redevelopment, design and construction of public facility and infrastructure improvements, and design and technical assistance to organizations and businesses impacting redevelopment areas; 3) Strengthening the safety net of supportive services for LMI people, especially those that prevent and reduce the frequency and duration of homelessness; and 4) Creating economic opportunity, including supporting employment/job training, workforce development, Section 108 Loan Guarantee, and other activities designed to create and develop capacity in LMI communities. Activities will include homeless services under ESG and public services under CDBG that address the needs of LMI people and households impacted by the Coronavirus/COVID-19 pandemic and its economic consequences. Activities may include: housing payment assistance; food and nutrition programs; workforce development; and other public service activities. Other potential sources of funding include: SHOP funding, Housing Trust Fund (HTF), Neighborhood Stabilization Program (NSP) funding, the Office of Healthy Homes and Lead Hazard Control (OHHLHC) Lead-Based Paint Hazard Control, and Lead Hazard Reduction Demonstration Grant Program (LHRD), Section 108 Loans, Continuum of Care (CoC), and Section 8 Project-based Voucher Program, Choice Neighborhood grant program through the U.S. Department of Housing and Urban Development (HUD). Locations of projects and activities will be throughout the City of Knoxville and Knox County.

HUD requires an Environmental Review Record (ERR) that identifies the types of projects and activities each jurisdiction intends to fund, the known sources and potential sources of funds, and level of environmental review required for each type of activity. Because the Consolidated Plans span five program years, the listed programs consist of projects with unspecified locations and/or descriptions. A Tiered Environmental Review Strategy has been developed and is included

in this ERR to ensure that currently unknown projects will be in compliance with all applicable environmental laws and authorities. As a part of this strategy, compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and Written Strategies, has been completed for all known sites within the City of Knoxville and Knox County and is provided.

The *Responsible Entity (RE)* is a unit of general local government or the state that has authority and assumes the responsibility for environmental review, decision-making, and action that would otherwise apply to HUD under the National Environmental Policy Act (NEPA). The RE determines the level of review of proposed projects based on the type of activity involved. The RE completes statutory checklists that examine both the potential impact of surrounding environmental conditions (such as flood plains or noise, etc.) on the project, as well as the potential impact the project may have on the surrounding environmental conditions (historical/archaeological, and Environmental Justice, etc.). Projects that have the potential for more impact have a higher level of review required. New construction, for example, has a much higher level of review than a project that involves funding supportive services or operating costs.

Projects which include new construction or substantial rehabilitation (including those that intend to use new Project Based Vouchers), that are not categorized as one to four units of single-family housing rehabilitation, will be addressed in the ERR on an individual basis and an **Environmental Assessment (EA)** will be conducted. The RE will complete a statutory checklist and an EA checklist. Depending upon the conditions found in the checklist, a determination will be made whether a *Finding of No Significant Impact* can be made. If this is established, the RE will follow a process (described more fully later in this document) that includes publishing a public notice of its findings, providing a public comment period, and responding to public comments before submitting to HUD. HUD also provides for a public comment period but only considers objections having to do with whether the RE conducted the EA according to regulation. If HUD finds no legitimate objection, it issues approval via an *Authority to Use Grant Funds* to the RE and the environmental review is complete. If instead, the results of the EA show a *Finding of Significant Impact*, the RE will publish that finding and, if proceeding, require an **Environmental Impact Statement (EIS)**. Generally, the RE will only proceed with an EIS under extreme circumstances, as the project is deemed to be an action which may significantly affect the quality of the human environment.

Projects that involve acquisition of property, moderate rehabilitation, reconstruction, and special projects directed to the removal of architectural barriers that restrict mobility, etc., are grouped together by project type and addressed in the ERR as **Categorically Excluded, subject to 24 CFR Part 58.5**. With this level of review, the RE completes a statutory checklist and if the results of

the review do not “trigger” any compliance action(s), the project may revert to **Exempt**, and the environmental review is complete. If the results of the review do trigger compliance action(s), an EA may be necessary (see above).

Projects that do not involve acquisition of property or any type of construction (such as economic development activities, homebuyer activities, predevelopment costs, operating costs, certain supportive services, furnishings, equipment, supplies, training, etc.) are grouped together by project type and addressed in the ERR as **Categorically Excluded, not subject to 24 CFR Part 58.5**. If the results of the review do not trigger compliance action(s), it will revert to **Exempt**, and the environmental review is complete. If the results of the review do trigger compliance action(s), a similar public process as the EA and submission to HUD (described later in this document) will be necessary.

Some projects (including environmental and other studies, development of plans and strategies, information and financial services, inspections and testing of properties for hazards or defects, purchase of insurance, tools, technical assistance and training, engineering and design costs, and public services that will not have physical impact or result in physical changes, etc.) are grouped together by project type and addressed in the ERR as **Exempt**. Projects or activities that are determined to be Exempt do not require any further environmental review as long as the RE documents in writing that each meets the conditions specified for such exemption.

In the table below, Projects 1 through 13 of this ERR are Categorically Excluded from the NEPA requirements as defined in 24 CFR 58.35, but are subject to 24 CFR 58.5. Projects 1 through 8 may also require an EA if new construction or substantial rehabilitation is planned. Projects 14 through 16 are also CE and typically revert to “Exempt” if there are no conditions required under 24 CFR 58.34, and Projects 17 through 32 would by definition be Exempt.

**Table 1: City of Knoxville/Knox County Combined Consolidated Plan
Program Years 2020 through 2024**

Project		Address	Funding Source and Amount*	Activity and Summary	Environmental Review Category
1	Rental Rehabilitation and Development	city-county wide	CDBG City: \$65,185.10 HOME City: \$1,500,000.13	Rehabilitation or conversion of existing buildings and/or development and new construction of new affordable, rental housing for rent to eligible LMI residents.	Categorical Exclusion or Environmental Assessment
2	CHDO Activities	city-wide	HOME City-\$400,000	Rehabilitation or conversion of existing buildings and/or development and new construction of new owner-occupied and/or rental housing for sale or rent to eligible LMI residents.	Categorical Exclusion or Environmental Assessment
3	Non-CHDO Activities	county-wide	HOME	Rehabilitation or conversion of existing buildings and/or development and new construction of new owner-occupied and/or rental housing for sale or rent to eligible LMI residents.	Categorical Exclusion or Environmental Assessment
4	Public Facility Improvements Catholic Charities Samaritan Place	city-wide 3009 Lake Brook Blvd.	CDBG	CDBG-eligible Public Facility improvements including acquisition, construction, reconstruction, rehabilitation, energy-efficiency, or installation of public facilities and improvements, removal of material and architectural barriers that restrict mobility and accessibility. Catholic Charities Samaritan Place serves elderly people experiencing homelessness.	Categorical Exclusion or Environmental Assessment
5	Public Infrastructure Improvements	city-county wide	CDBG	CDBG-eligible Public Infrastructure improvements including but not limited to pedestrian improvements, vehicular street improvements, or storm water improvements.	Categorical Exclusion or Environmental Assessment
6	Transitional Housing	city-wide	ESG CDBG	Rehabilitation of existing buildings or conversion of buildings and/or development of new buildings for use as transitional housing.	Categorical Exclusion or Environmental Assessment
7	Emergency Shelter	city-wide	ESG CDBG	Rehabilitation of existing buildings or conversion of buildings and/or development of new buildings for use as emergency shelter.	Categorical Exclusion or Environmental Assessment

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8	Owner-Occupied Rehabilitation, Energy Retrofits, and Emergency Repairs	city-wide	CDBG \$48,680.49 HOME \$1,146,735.75	Rehabilitation and replacement homes for LMI homeowners living in sub-standard properties.	Categorical Exclusion or Environmental Assessment
9	Blighted Property Programs and Blighted Property Maintenance/Dirty Lot Cleanup/ Cleanup	city-wide	CDBG: \$22,029.97	Site preparation, artistic board-up, abandoned property redevelopment and other vacant property initiatives to mitigate the negative impact of blighted properties/homes. Codes-related property cleanup, demolition, garbage cleanup, and disposal.	Categorical Exclusion
10	Emergency Home Repairs/Minor Home Repairs CAC Housing and Energy Emergency Home Repair Neighborhood Housing Inc. (NHI) Operation Back Yard	city-county wide 2247 Western Avenue 318 N Gay Street	CDBG City: \$902,000 County: \$350,000 County: \$50,000	Emergency home repairs and/or minor home repairs for LMI homeowners and LMI renter-households to address health and safety issues, stabilization, and prevention of further deterioration.	Categorical Exclusion
11	CDBG- and ESG-COVID Recovery	city-county wide	City- CDBG-COVID Recovery: \$TBD ESG-COVID Recovery (State ESG): \$TBD County- CDBG20-COVID Recovery: \$710,097.00	Recovery grants due to the COVID-19 virus.	Categorical Exclusion
12	Down Payment Assistance	city-county wide	HOME City: \$105,000	Assist LMI residents with homeownership opportunities.	Categorical Exclusion

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13	Commercial Development Loans	city-wide	CDBG	CDBG-eligible loans for the purpose of business creation or expansion in LMI areas for job creation.	Categorical Exclusion
14	Homelessness Prevention Services Metro Drug Coalition CAC Homeward Bound VMC Salvation Army	city-county wide 4930 Lyons View Pike 2247 Western Avenue 511 N. Broadway 429 N. Broadway	County: \$46,000 ESG-CV city: \$278,893 County: \$15,000	Services that help prevent homelessness, including housing relocation and stabilization services, funding a CAC homeless outreach caseworker, and short- and/or medium-term rental assistance.	Exempt
15	Rapid Re-housing Assistance Salvation Army Joy Baker Center CAC Homeward Bound VMC Rapid Re-housing	city-wide 429 N. Broadway 2247 Western Avenue 511 N. Broadway	ESG: \$133,965 ESG-CV: \$183,052	Services that move homeless households as quickly as possible into permanent housing and achieve stability.	Exempt

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Project		Address	Funding Source and Amount*	Activity and Summary	Environmental Review Category
16	Public Services	city-county wide	CDBG	CDBG-eligible Public Services including but not limited to those concerned with employment, credit counseling, childcare, health, mental health, drug abuse, education, fair housing counseling, energy conservation, homebuyer down payment assistance, broadband internet in affordable housing, fair housing counseling, or home-buyer counseling.	Exempt
	Breakthrough Corporation	900 E. Hill Ave	County: \$20,000		
	Knoxville Academy of Medicine Project Access	115 Suburban Rd	County: \$20,000		
	HomeSource East TN	109 Winona St	County: \$12,000		
	Knoxville Area Urban League	1514 E Fifth Ave	County: \$10,000		
	CAC Mobile Meals	1747 Reynolds St	CDBG-CV City: \$100,000		
17	Public Services/Housing Assistance Program(s)	2247 Western Avenue	CDBG City: \$67,760	Public service activity that provides housing payment assistance (including rent/mortgage payment, rent/mortgage arrearage(s), utility arrearage(s)) for households impacted by COVID-19.	Exempt
	CAC	318 N Gay Street	CDBG-CV: \$829,135		
	Knoxville Leadership Foundation/Compassion Coalition	109 Winona St			
	HomeSource East TN				
18	Helen Ross McNabb Youth Care and Indigent Care	county-wide 205 West Springdale Ave & 3006 Lakebrook Blvd.	Not funded through CDBG but have the potential within the next 5 years	Public Service Activities	Exempt
	Raising a Voice	2636 East Magnolia Ave.			

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19	Fair Housing	city-county wide	CDBG	Administration/Public Service	Exempt
20	Bridge Refugee Services	city-county wide 4420 Whittle Springs Road	CDBG County: \$10,000	Language translation services	Exempt
21	Knox County Public Defenders Community Law Office	county-wide 1101 Liberty Street	CDBG County: \$20,000	Provide provisions for legal representation within the criminal justice system for those that cannot afford it.	Exempt
22	Street Outreach	city-wide	ESG	Essential services necessary to reach out to unsheltered people who are experience homelessness to connect them with emergency shelter, housing, or critical services.	Exempt
23	HMIS/CES Knox HMIS (UT)	city-county wide 600 Henley Street	ESG CDBG County: \$10,000	Administration of Homelessness Management Information System (HMIS) and Coordinated Entry System (CES).	Exempt

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24	Emergency Services and Provision of Essential Amenities	city-county wide		Essential and other services, and essential amenities (basic hygiene facilities – bathrooms, showers, laundry facilities or services) provided to/for people experiencing homelessness. Also may include shelter operations and relocation assistance for people displaced with ESG funds.	Exempt
	Salvation Army Joy Baker Center and Bridge of Hope	429 N. Broadway	ESG-CV City: \$183,052		
	VMC Resource Center	511 N. Broadway	ESG-COVID Recovery (State ESG): \$TBD		
	VMC Dental Clinic	511 N. Broadway	CDBG ESG City: \$111,000		
	VMC Foyer	409 N. Broadway	County: \$18,000		
	Catholic Charities Samaritan Place	3009 Lake Brook Blvd.			
	YWCA Keys of Hope	416 Clinch Ave.			
25	Employment and Job Training, Workforce Development	city-county wide		Programs to support training, education, and the employability of LMI residents.	Exempt
	NHI KnoxWorx Workforce Development	1022 Elm Street	CDBG		
	CAC 'Building Our Youth'	2247 Western Avenue	City: \$341,105		
	Knox Chamber Partnership	17 Market Street, #201			

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Project		Address	Funding Source and Amount*	Activity and Summary	Environmental Review Category
26	Job Creation and Economic Development	city-county wide	CDBG Section 108 Loan Guarantee	CDBG-eligible development funds for job creation project(s).	Exempt
27	Technical Assistance to Non Profits and Agencies East Tennessee Community Design Center	city-county wide 1300 N. Broadway	CDBG City: \$55,000	Planning and design technical assistance to agencies focused on neighborhood stabilization projects.	Exempt
28	Housing Services	city-county wide	CDBG City: \$531,473 County: \$46,680	Project delivery expenses that support CDBG and HOME housing activities benefiting LMI residents.	Exempt
29	HOME Administration	city-county wide 400 Main Street	HOME City: \$165,126 County: \$41,085	Administration expenses that support HOME projects and activities.	Exempt
30	CDBG Administration	city-county wide 400 Main Street	CDBG City: \$352,362 CDBG-CV: City: \$107,283 County: \$241,420	Administration expenses that support CDBG projects and activities	Exempt
31	ESG Administration	city-wide 400 Main Street	ESG: \$14,884 ESG-CV: \$51,327	Administration expenses that support ESG projects and activities	Exempt

**Table 1: City of Knoxville/Knox County Combined Consolidated Plan
Program Years 2020 through 2024**

Project		Address	Funding Source and Amount*	Activity and Summary	Environmental Review Category
32	Services that address high priority needs	city-county wide	CDBG	Programs that address the needs of persons living in LMI areas and special needs populations	Exempt

*Actual amounts will be described in the Annual Action Plan

Approximate size of the project area: Knox County is approximately 526 square miles in size. The City of Knoxville is located within Knox County.

Length of time covered by this review: Five (5) years.

Maximum number of dwelling units or lots addressed by this tiered review: Not specified. Will be addressed on a case-by-case basis as needed.

Level of Environmental Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5.

Funding Information

Table 2 is a partial list of funding sources and the known approximate amounts of funding for program years 2020 through 2024. If funding sources are not listed in the table below, then amounts of those sources are not known at this time.

Table 2 – Known Funding Sources and Approximate Amounts					
Program	2020	2021	2022	2023	2024
CDBG	City: \$2,220,469 County: \$1,207,100	City: \$1,861,814 County: \$1,207,100	City: \$1,861,814 County: \$1,207,100	City: \$1,861,814 County: \$1,207,100	City: \$1,861,814 County: \$1,207,100
CDBG COVID Recovery	City: \$1,036,418 ESG20: \$513,272 County: \$710,097	TBD	TBD	TBD	TBD
HOME (includes CHDO)	City: \$3,316,861 County: \$430,441	City: \$1,651,264 County: \$430,441	City: \$1,651,264 County: \$430,441	City: \$1,651,264 County: \$430,441	City: \$1,651,264 County: \$430,441
ESG	City: \$148,849	City: \$148,849	City: \$148,849	City: \$148,849	City: \$148,849
ESG-CV COVID Recovery	City: \$513,272	TBD	TBD	TBD	TBD

Estimated Total HUD Funded Amount: **City: \$20,425,327** **County: \$8,897,802**

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
City: \$25,583,555 County: \$8,897,802

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities and Written Strategies

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4, 58.5, and 58.6	Was compliance achieved at the broad level of review?	If Yes: Describe compliance determinations made at the broad level. If No: Describe the policy, standard, or process to be followed in the site-specific review.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Two airports service Knox County; McGhee Tyson airport is located in Blount County, and Island Home airport, which does not serve jets, is located in downtown Knoxville. According to Mr. Trevis Gardner (Vice President of Airport Operations, Metropolitan Knoxville Airport Authority), neither airport has uncontained (outside airport property) airport clear and accident potential zones. See attached map of airport locations in relation to the city and county boundaries.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Knox County/City of Knoxville is not located in a coastal area (see attached map), therefore statute is not applicable.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The latest version of the Flood Insurance Maps issued by the Federal Emergency Management Agency will be used to assess the flood designation for each proposed activity. A copy of this map depicting the Site shall be placed in the Environmental Review. In general, no rehabilitation or individual action will take place in a floodway. Work may be allowed in a 100-year floodplain, but all applicable federal, state, and local requirements must be in compliance. In that case, floodplain impacts must be assessed.

		<p>If a new construction project is planned within a floodplain, a written eight (8)-step review process (see 24 CFR §55.20) will be performed if the project is located in a floodplain area, and the public notices will be published as required in 24 CFR 55.20 (b) & (g). Executive Order 11988 directs federally funded agencies to take certain steps to avoid: (a) to the extent possible, the long and the short term adverse impacts associated with the occupancy and modification of floodplains, and (b) the direct development within or modification of floodplains, wherever there is a practical alternative. If the project is a renovation or rehabilitation of an existing structure that is located within a flood plain, the responsible entity is responsible for assuring that flood insurance under the National Flood Insurance Program is obtained and maintained. Proof of Flood Insurance and a photocopy of the portion of the map that indicates the site must be included in the Environmental Review.</p> <p>In addition to the HUD requirements, projects resulting in any development in a floodplain will also require authorization from the Local Floodplain Administrator prior to beginning construction.</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.5		
<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project's county or air quality management district is in attainment status for all criteria pollutants. Knox County is not listed in the Nonattainment Areas for Criteria Pollutants (Green Book). The project is in compliance with the Clean Air Act. No negative impacts from the housing projects are expected. Temporary sources of air emissions would include exhaust from construction equipment and dust from earthmoving activities and vehicles operating on exposed soil. These emissions are expected during construction activities.</p>

		Although construction activities would produce dust and particulate emissions, these actions should pose no significant long-term impact upon air quality standards.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Knox County/City of Knoxville is not located in a coastal area (see attached map), therefore statute is not applicable.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Projects will occur in urban developed areas on existing developed sites. No impact to endangered species is expected. KCDD and KCCD will follow USFWS Information for Planning and Consultation (IPaC) protocol for any projects which include new construction and may potentially affect endangered species. The KCDD has a Memorandum of Agreement with the USFWS which is attached in Appendix A.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.

Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Tennessee does not have a sole source aquifer; therefore, statute is not applicable. See attached map taken from https://www.epa.gov/dwssa/map-sole-source-aquifer-locations in Appendix A.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	See written strategy, must be addressed on a site-by-site basis. Individual sites will be searched on the US Fish and Wildlife website: https://www.fws.gov/wetlands/data/mapper.html
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	No National Wild or Scenic Rivers are located in Knox County, Tennessee according to the National Wild and Scenic River System in the US; therefore, statute is not applicable. Only the Obed River located approximately 40 miles west of Knoxville/Knox County is listed as a National Wild and Scenic River (see attached map in Appendix A).
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Project sites will not adversely affect low- and moderate-income citizens. Instead, the projects are designed to enhance low- and moderate-income families. Projects will not be funded in areas of potential contamination (e.g. noise, toxic or hazardous operations, Brownfields, etc.). If projects are determined to be planned on or near these types of properties, then mitigation will be provided or an alternative site chosen.

Written Strategy for Environmental Review for Unspecified Sites

This written strategy shall be employed for activities conducted for programs 1 through 13 on Table 2. This strategy may also be employed for unforeseen programs/projects which might arise during program years 2020 through 2024 and that may be Categorically Excluded per 24 CFR 58.35(a).

The RE must maintain a written record of the environmental review undertaken for each project available for public review at the RE address. The ERR must provide a comprehensive project description and evidence of the process from start to finish including, but not limited to, the following:

1. Complete, detailed project description including all activities proposed by all funding sources
2. Description of pre-existing environmental conditions of the project site and surrounding area
3. Completion of current environmental forms applicable to the level of review required
4. Acceptable support documentation; color maps (U.S.G.S, aerial, zoning, FEMA floodplain, soil survey, etc.), web-based material, color photographs, documented site visits and agency consultations, site plans, architectural/engineering reports, previous environmental studies, agency comments and clearances, etc.
5. Proof of compliance with NEPA and related laws and authorities
6. Conditions for environmental approval and proof of required implementation
7. All environmental studies required and completed for the project
8. Mitigation measures required and completed, and the outcomes
9. Project and activity alternatives considered and the basis for the chosen alternative
10. Environmental notices and evidence of the opportunity for public involvement
11. Environmental determination (Finding) signed by the RE Certifying Officer
12. Request For Release of Funds/Certification (RROF/C)
13. Formal release of funds/environmental approval
14. Other information as requested by federal and state environmental regulatory agencies

As detailed information becomes available for specific projects, the following steps need to be followed:

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

1	Flood Insurance
	<p>Compliance with this part will be address through a Tier II Site-Specific Environmental Review checklist. This will be achieved through the use of FEMA maps to determine if the specific site receiving federal housing assistance is within a FEMA designated floodplain or floodway and obtaining flood insurance as specified by the "National Flood Insurance Program" (NFIP). Flood Insurance for loans requires the insurance coverage to be maintained for the total loan amount and for the life of the loan, regardless of the transfer of ownership. The amount of insurance coverage is based on the principal loan amount. For grants and other non-loan forms of financial assistance, the coverage will be in the grant amount and maintained for the useful life of the improvement, regardless of transfer of ownership. Coverage for grants must equal the maximum limit specified by the NFIP depending on the type of structure, development, or project cost, whichever is less. The development or project cost is the total cost for acquiring, constructing, repairing, or improving the structure. These insurance requirements will be listed in the Tier II Site Specific reviews and monitored for the designated coverage periods.</p>
2	Contamination and Toxic Substances
	<p>Compliance of this part will be addressed through the completion of a Tier II Site Specific environmental checklist for each of the individual sites. A determination will be secured by using the NEPassist tool within the EPA website. This tool will indicate if the proposed site is located on or within 3,000 feet of an area that contains or may have contained hazardous waste (Superfund Clean-up site, Brownfields). Reviewing the Enforcement & Compliance section of the website will allow this determination to be made.</p>
3	Floodplain Management
	<p>Compliance with this part will be addressed through a Tier II Site-Specific Environmental Review checklist through determining if the specific site is within a FEMA designated "Special Flood Hazard Area" (SFHA). The FEMA map will indicate the site location marker, map & panel number, map revision date, and if the site is in a designated SFHA- identified flood zone. If review of the FEMA website indicates the specific site is on a "non-printed panel" with no indication of being located in a floodplain, the ER preparer will utilize the City of Knoxville's current GIS mapping tool with a FEMA map overlay to determine if the site is within a SFHA. Also, rehabilitation activities that are incidental to the floodplain-no further evaluation is required under this part.</p>
4	Historic Preservation
	<p>Section 106 of the National Preservation Act of 1966 (NHPA), as amended, mandates that agencies with jurisdiction over federally assisted activities afford the National Advisory Council on Historic Preservation (NACHP) and the State Historic Preservation Officer (SHPO) a reasonable opportunity for comment on a project's impact on historic properties. Pursuant to HUD's guidelines on compliance with the Section 106 review process (36 CFR Part 800), the City of Knoxville and Knox County are operating under individual Programmatic Agreements (PA) that includes the Knoxville-Knox County Planning (KKCP) Department and the SHPO (see attached agreements in Appendix B). As per this programmatic agreement, all properties that are 45 years and older will be reviewed under Section 106 of the NHPA of 1966 by the (KKCP). These services will include homeowner rehabilitation, rental rehabilitation, HVAC replacement, and down-payment assistance. If any of these activities are determined by KKCP to impact an historic structure or area (either by letter or map), additional information will be submitted to KKCP for review and comment in accordance with the MOA. If approved by KKCP, the package is submitted to SHPO for concurrence.</p>

5	Noise Abatement and Control
	Compliance with this part will be addressed through a Tier II Site-Specific Environmental Review checklist to determine if a proposed site is within the statutory distance of specified noise generators. These generators are as follows: 1,000 feet of a highway/roadway, 3,000 feet of an active railroad track, 15 miles of an FAA-regulated civilian or military airport. If a site is within the statutory distance specified by this part a determination of the decibel level being generated by the noise source must be made. Data will be entered into the DNL Electronic Calculator to determine the decibel level and if mitigation is required. This may be accomplished by using noise attenuation measures during the rehabilitation process.

Supporting documentation

- a. By individual Tier II or Site-Specific reviews:
 - i. Environmental Review Partners (including applicants, consultants, contractors, nonprofits, and public housing authorities who assist with the environmental review process but may not legally take responsibility for completing an environmental review) will either input an environmental review into the HUD Environmental Review Online System (HEROS) database or;
 - ii. Environmental Review Partners may use the Partner Worksheets found on the **hudexchange.info** website to submit information on a project's compliance with federal environmental laws and authorities. These worksheets, along with the Site Specific Checklist (found in Appendix B) and all supporting documentation, should be submitted to the Responsible Entity that is responsible for completing the environmental review.
- b. A copy of the Certification of Categorical Exclusion (subject to §58.5) and Environmental Review for Activity/Project that is Exempt or Categorically Excluded (not subject to §58.5) can be found in Appendix B.
- c. A copy of the Environmental Assessment Factors and Analysis form OMB No. 2506-0177 is included in Appendix B. This form is designed to be used by those "Partners" (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves, and are submitting an EA to HUD in paper form. This document should be submitted along with the Related Law and Authority worksheets documenting compliance with the environmental requirements listed at 24 CFR 50.4 and 58.5-6.
- d. Assuming no circumstances that require compliance with any of the Federal laws and authorities cited in 24 CFR §58.5, complete the Environmental Determination (Finding) signed by the RE Certifying Officer.

- e. Submit a Request for Release of Funds/Certification (RROF/C). This document can be found in Appendix B.

All parts of the Tiered Environmental Review must be complete before committing funds on any one site. The ERR is a legal document. It is the best and often only defense proving compliance with applicable laws and regulations. The result should be a complete, yet concise record supporting each step of the environmental process ending in the final determination of the level of impact. All forms and documentation shall be kept together and placed in Appendix C of this report.

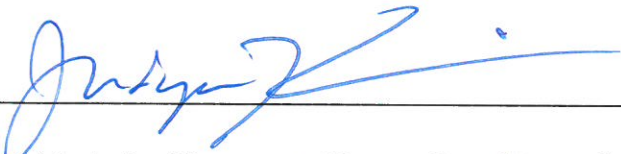
Determination:

- ☐ Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
- ☒ There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST or Exempt.

Preparer Signature:  Date: June 9, 2020

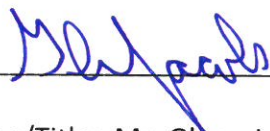
Name/Title/Organization: Jessica Lindbom, Quantum Environmental and Engineering Services, LLC

Responsible Entity Agency Official Signature:

 Date: 6/15/2020

Name/Title: Ms. Indya Kincannon, Mayor, City of Knoxville

Responsible Entity Agency Official Signature:

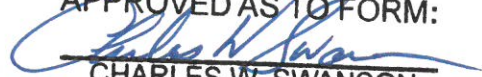
 Date: 6/10/2020

Name/Title: Mr. Glenn Jacobs, Mayor, Knox County

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

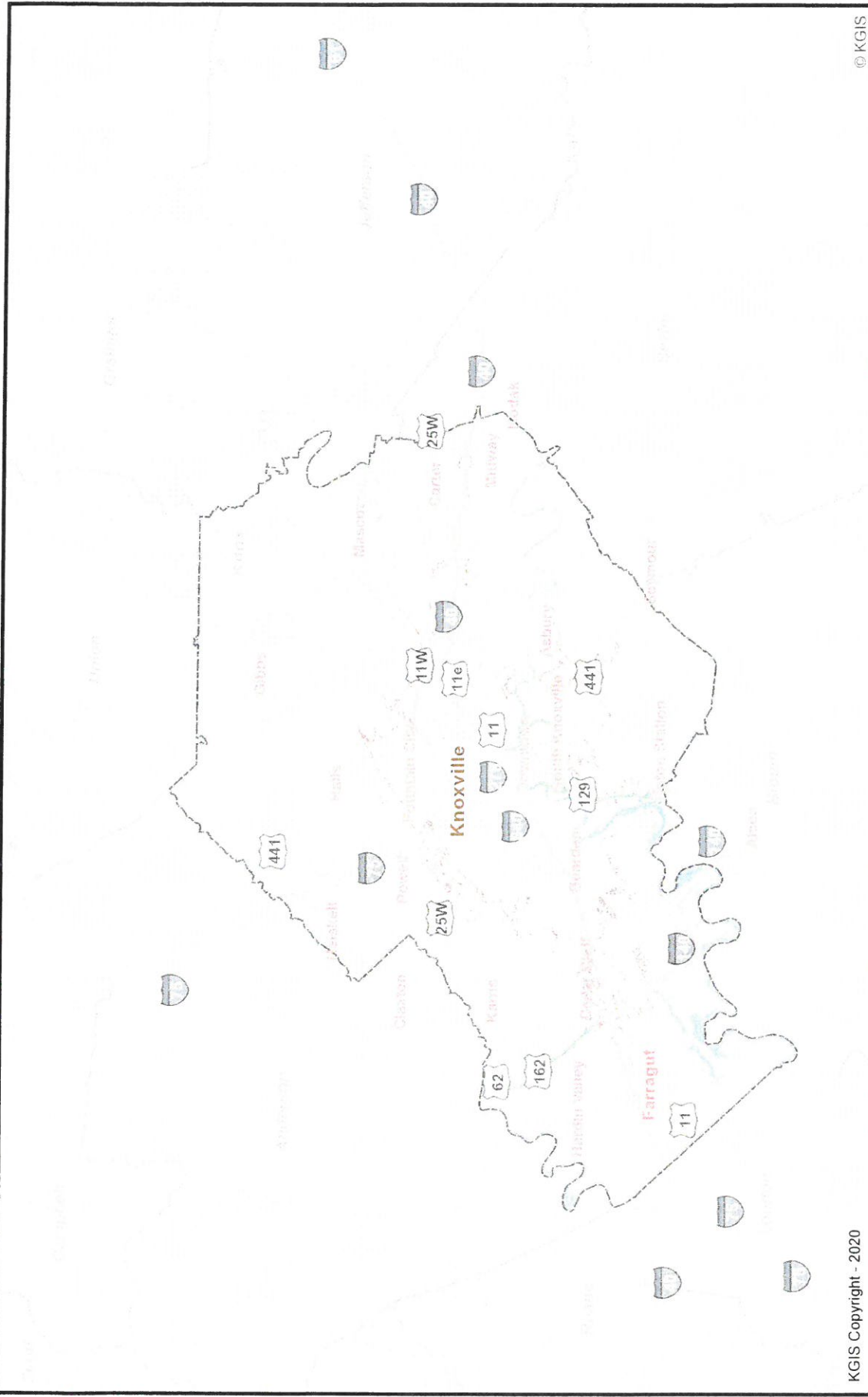
This document represents the Tier I or Broad-Level review *only*. As individual sites are selected, this review must be supplemented by individual Tier II or site-specific reviews for each site. All laws and authorities requiring site-specific analysis will be addressed in these individual reviews.

APPROVED AS TO FORM:


CHARLES W. SWANSON
LAW DIRECTOR

APPENDIX A

ATTACHMENTS - SUPPORTING DOCUMENTATION



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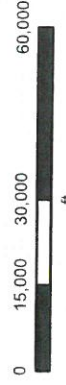
© KGIS

City of Knoxville and Knox County Boundaries

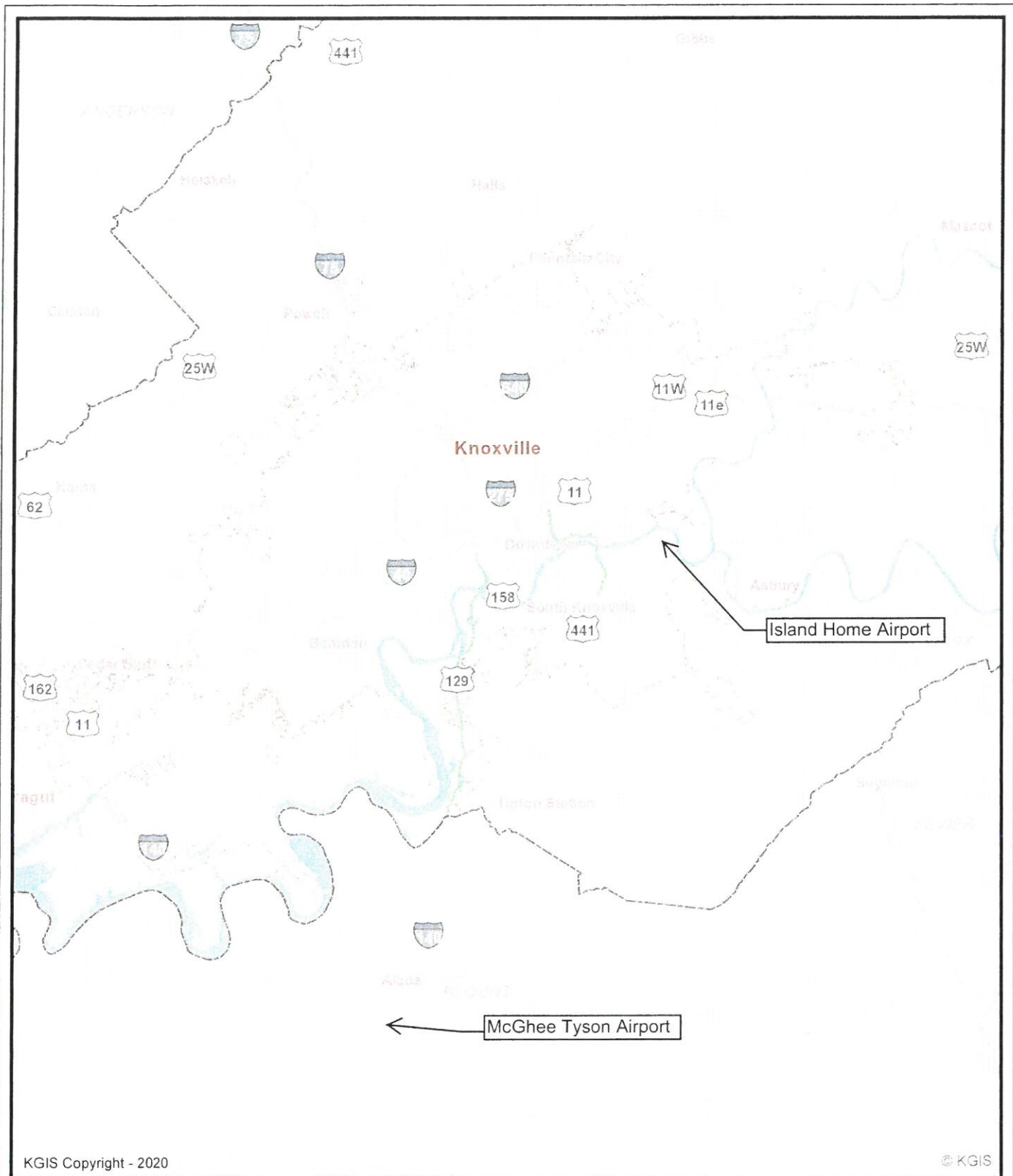
Knoxville - Knox County - KUB Geographic Information System



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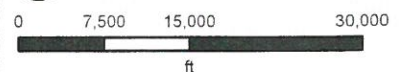


Airports serving the City of Knoxville/Knox County

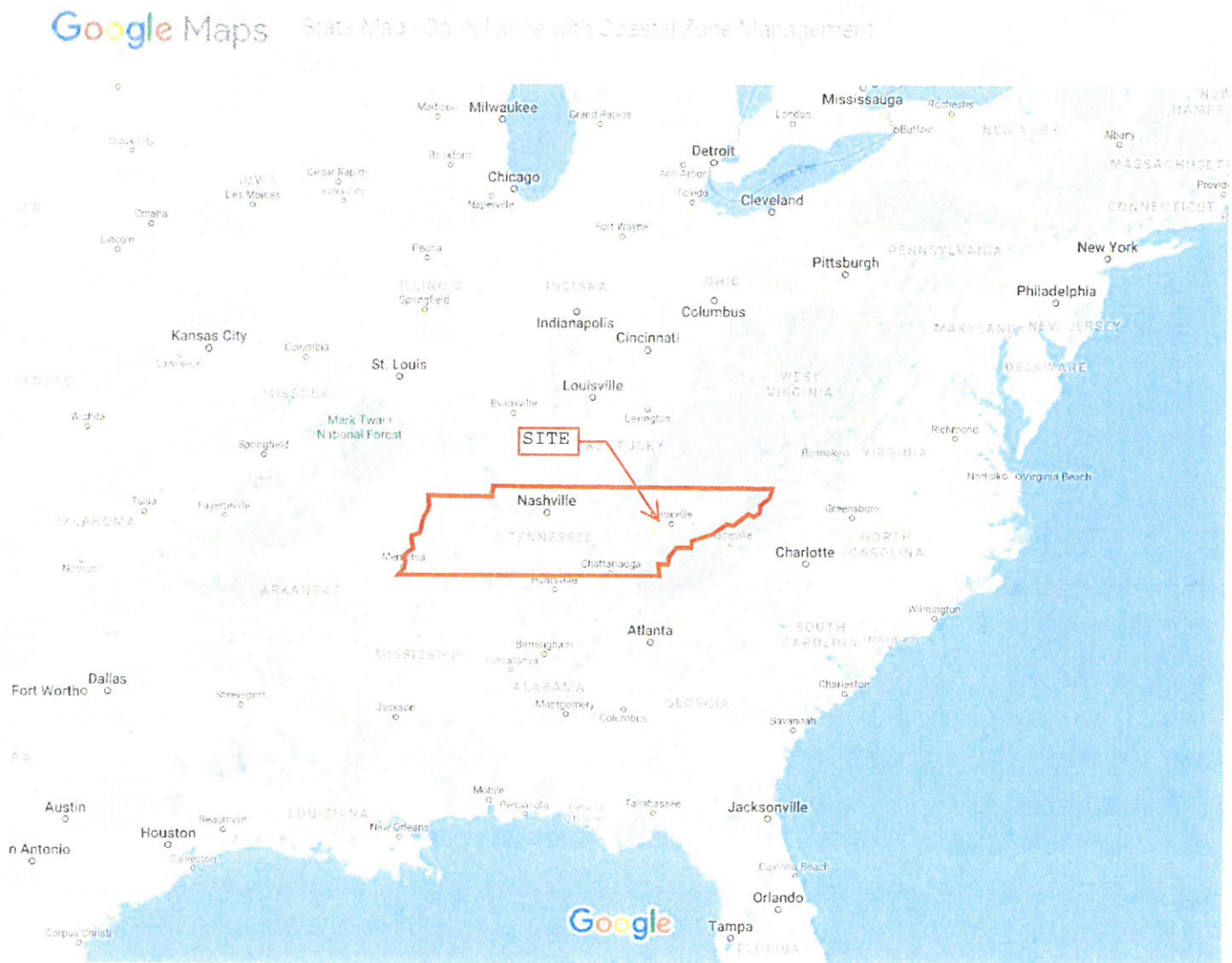
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MEMORANDUM OF AGREEMENT BETWEEN
CITY OF KNOXVILLE AND
DEPARTMENT OF THE INTERIOR U.S. FISH AND WILDLIFE SERVICE TENNESSEE FIELD
OFFICE

SUBJECT:

Reduction of paperwork and unnecessary review of certain City of Knoxville (COK) projects which typically result in no adverse impacts to fish and wildlife resources. (FY15-CPA-0222)

PURPOSE:

The U.S. Fish and Wildlife Service (FWS) is charged with protection of fish and wildlife resources, particularly wetlands and endangered species. In this role, the FWS provides comments to COK regarding the impact of many specific individual projects which are funded and/or executed by COK. It is recognized that certain categories of COK activities typically result in no adverse impacts to the natural environment and that a detailed project review by FWS is not warranted for such projects. This Memorandum of Agreement (MOA) is intended to define the categories of projects that do not require written comments from the FWS.

SCOPE:

This MOA does not supersede the responsibilities and obligations of the FWS, COK, or Federal agencies providing funding to COK, which are mandated by the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et. Seq.), Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq), or related regulations and agency policy. The following categories of projects have been evaluated in accordance with these statutes, regulations, and policies, and a conclusion reached by both FWS and COK that specific projects within these categories will not result in adverse impacts fish and wildlife resources, including endangered species. As a result, this MOA constitutes programmatic coordination pursuant to the Coordination Act and a "blanket consultation" pursuant to Section 7 of the Endangered Species Act.

CATEGORIES:

1. Renovation, remodeling, repair, demolition, replacement, or expansion of existing structures provided that the structures and associated developed land (e.g., parking lots) are not expanded into previously undeveloped areas. (Examples: Renovation of substandard single or multiple family residences, conversion of an office building to a child care facility, renovation or expansion of existing factory building) Note: "Undeveloped areas" are considered to be those sites where natural vegetation dominates. "Developed areas" are paved, filled, graveled, or vegetated in grasses that are routinely mowed.
2. Purchase of single or multi-family housing, provided that the structures are already in existence at the time that COK funding is made available to the purchaser (i.e., potential impact to the environment have occurred during construction and prior to any Federal nexus.)

3. Construction of single or multi-family housing, provided that the construction takes place on a "prepared" home site. A "prepared" home site is one that has been cleared of natural vegetation, and filled, graded, etc., in the normal course of preparation for housing construction prior to, and independent of a COK funded activity. (Example: Recipient constructs a home or apartment complex on a lot purchased within an existing developed subdivision, and the lot has already been site-prepped.)
4. Placement/replacement of electric and telephone transmission lines and related equipment (e.g., transformers) on existing utility poles and within existing rights-of-way.
5. Replacement of existing waterlines provided that no perennial streams are crossed and all work is accomplished within existing, maintained rights-of-way. Perennial streams are those that do not go dry during the summer of fall. They are usually indicated on topographic maps with a solid blue line. Crossings of perennial streams can occur under the terms of this Agreement if the waterline is suspended from a highway bridge structure.
6. Construction of new waterlines provided that all construction occurs within maintained (mowed) street or highway rights-of-way and no perennial streams are crossed. Crossings of perennial streams can occur under the terms of this Agreement if the waterline is suspended from a highway bridge structure.
7. Replacement of existing storm or sanitary sewer lines provided that no perennial streams are crossed and all work is accomplished within existing, maintained rights-of-ways. Crossing of perennial streams can occur under the terms of this Agreement if the sewer lines are suspended from a highway bridge.
8. Construction of new storm or sanitary sewer lines provided that all construction occurs within maintained (mowed) street or highway rights-of-way and no perennial streams are crossed. Crossings of perennial streams can occur under the terms of this Agreement if the sewer line is suspended from a bridge structure.
9. Installation of traffic control signals.
10. Installation, replacement, or relocation of street lights.
11. Removal and replacement of existing sidewalks, curb, gutter, streets and parking areas provided that the improvements do not expand into previously undisturbed areas.
12. Construction of new sidewalks, curb, and gutter within existing maintained rights-of-way or on developed residential or commercial properties.

13. Renovation of existing restrooms, pavilions, ballfields, shelters, parking areas, and/or other similar features found in local parks or recreational areas.

GENERAL PROVISIONS

Either agency may unilaterally withdraw from this agreement with 30 days written notice. This MOA will be reviewed annually and revised as appropriate. Revisions may be requested at any time by either agency. All revisions will be made in writing and require the concurrence of both agencies.

U.S. Fish and Wildlife Service, Tennessee Field Office

By: Ray W. Shabo Date: 2/12/15
for Mary E. Jennings
Field Supervisor

City of Knoxville

By: Becky Wade Date: 2/17/15
Director of Community Dev.
Becky Wade
Director of Community Development

State of Tennessee Scenic River Classifications

Rivers or segments of rivers selected for state scenic river designation are categorized into classifications based on set criteria to best suit the manner in which the river shall be managed. The three state scenic river classifications are:

Natural River Areas - Those rivers or sections of rivers that are free flowing, unpolluted and with shorelines and scenic vistas essentially primitive and generally inaccessible except by trail.

Pastoral River Areas - Those rivers or sections of rivers that are free flowing, unpolluted and with shorelines and scenic vistas partially or predominately used for agricultural and other recreational activities which do not interfere with public use and enjoyment of the river and shores.

Partially Developed River Areas - Those rivers or sections of rivers that are free flowing, unpolluted and with shorelines and vistas essentially more developed.

1. Blackburn Fork- Class I - Natural River Area - That segment of the stream from the county road at Cummings Mill downstream one and one-half (1-1/2) miles. Class II- Pastoral Area - That segment downstream from a point one and one-half (1-1/2) miles downstream from the county road at Cummings Mill to its confluence with Roaring River.
2. Buffalo River- Class II - Pastoral River Area- The entire river, except that portion which lies within Wayne, Perry, Humphreys and Lewis counties.
3. Clinch River- Class III - Developed River Area - That portion from Melton Hill Dam upstream to Pellissippi Parkway.
4. Collins River- Class II - Pastoral River Area - That segment which lies within the Savage Gulf natural-scientific area.
5. Conasauga River- Class I - Natural River Area - The segment of the river in Polk Co. upstream from the Hwy 411 bridge.
6. Duck River- Class II - Pastoral River Area - That segment of the Duck River beginning at Iron Bridge Road at river mile a136.4 and extending continuously to the boundary of Marshall County at river mile 173.7.
7. French Broad River- Class III - Developed River Area - That segment from the North Carolina state line to its confluence with Douglas Lake.
8. Harpeth River Class II - Pastoral River Area - The entire river except that segment lying north of Highway 100 and south of Interstate 40 in Davidson County; and except those segments located in Cheatham, Dickson and Williamson counties. Class III Developed River Area - Only the segment of the Harpeth lying north of Hwy 100.
9. Hatchie River- Class I - Natural River Area - as a swamp river.

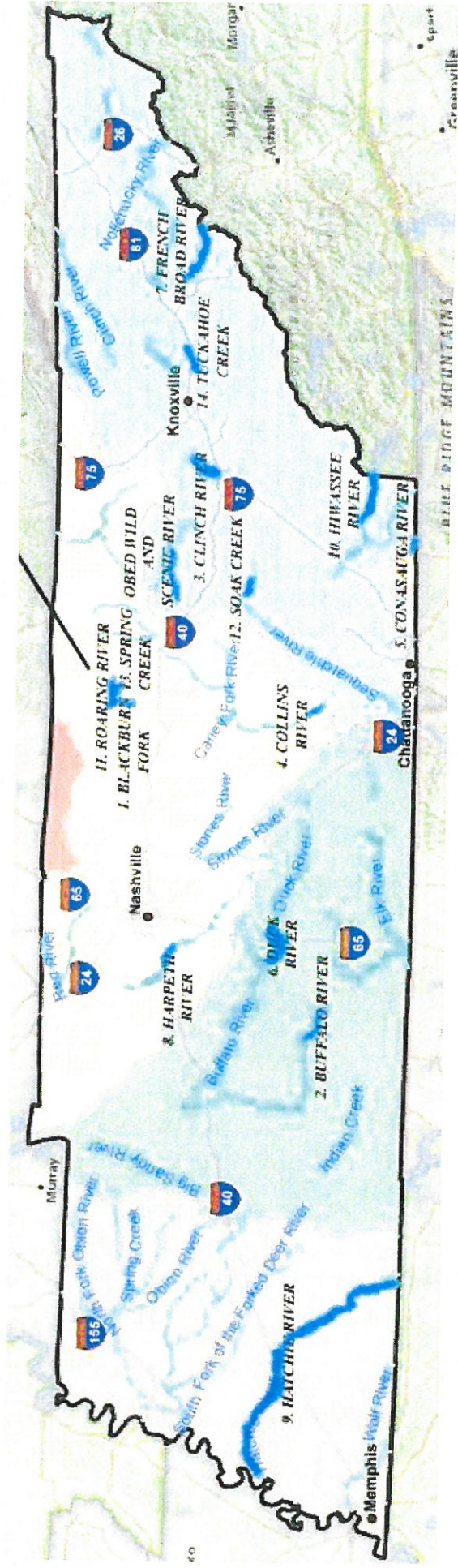
10. Hiwassee River- Class III - Developed River Area- That portion from the Highway 411 bridge to the North Carolina line.

11. Roaring River- Class I - Natural River Area - That segment from State Route 136 downstream two (2) miles. Class II - Pastoral River Area - That segment downstream from a point two (2) miles downstream from State Class II - Pastoral River Area - Route 136, to its confluence with the Cordell Hull Lake.

12. Spring Creek- Class I - Natural River Area - That segment from Waterloo Mill downstream to the Overton-Jackson county line. Class II- Pastoral River Area -That segment between State Highway 136 and Waterloo Mill, and that segment downstream from the Overton-Jackson county line to its confluence with Roaring River.

13. Tuckahoe Creek- Class III - Developed River Area - The entire creek.

Map of Scenic State River Classifications Including the National Wild and Scenic Obed River



**PROGRAMMATIC AGREEMENT
AMONG THE TENNESSEE STATE HISTORIC PRESERVATION OFFICER, THE
CITY OF KNOXVILLE, AND KNOXVILLE-KNOX COUNTY PLANNING, REGARDING
KNOXVILLE, TENNESSEE PROGRAMS FUNDED BY THE U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT PURSUANT TO 36 CFR SECTION 800.6(a)**

WHEREAS, the City of Knoxville (City) administers the Community Development Block Grant (CDBG) Program, Public Housing Program, the HOME Investment Partnership Program, the Emergency Solutions Grant, the Section 108 Loan Program, and the Housing Opportunities for People with AIDS (HOPWA) Program, the Lead Hazard Control Grant, and any future United States Department of Housing and Urban Development (HUD) program-funded activities (Programs); and

WHEREAS, the City is acting as the responsible entity in accordance with HUD's environmental regulations at 24 CFR Part 58.4 and as such, is responsible for compliance with Section 106 of the National Historic Preservation Act; and

WHEREAS, the City has determined that the administration of the Programs may have an effect upon properties listed on or eligible for the National Register of Historic Places (National Register) and has consulted with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800.1 of the Council's regulations implementing Section 106 of the National Preservation Act (16 U.S.C. 470f), and

WHEREAS, Knoxville-Knox County Planning (KKCP) maintains an ongoing survey in Knoxville and Knox County of districts, sites, buildings, structures, and object (hereafter "properties") that may meet the criteria for listing in the National Register in accordance with the criteria for Determinations of Eligibility for Inclusion in the National Register of Historic Places [36 CFR 800.2 C (2)], and

NOW, THEREFORE, the SHPO, the City, and KKCP agree that the Programs shall be administered in accordance with the following stipulations to satisfy the City's Section 106 responsibilities for all individual undertakings of the Programs.

STIPULATIONS

The City will ensure that the following measures are carried out.

1. Professional Qualifications

The SHPO will review and approve the credentials of KKCP professional staff to confirm they meet the qualifications published in Appendix A to 36 CFR Part 61 and to ensure the application of the Standards.

2. Identification

The following stipulations for identification and treatment apply only to undertakings with no ground-disturbing activities.

The City will notify KKCP staff of all districts, sites, buildings, structures, and objects (hereafter "properties") that are forty-five (45) years old or older that are located within the boundaries of targeted priority neighborhoods and other project areas slated for Program activities. The City will provide current photographs of properties that are forty-five years old or older to KKCP staff. KKCP staff (meeting the qualifications published in Appendix A to 36 CFR Part 61) will confirm the properties' age and survey the properties at the reconnaissance level. KKCP will be responsible for maintaining current information on local historic zoning overlays, NRHP listings, and neighborhood information as needed. KKCP will consult survey files; GIS maps documenting past historic resource surveys, local zoning overlays and NRHP sites; and also survey at the reconnaissance level the surrounding neighborhood context.

Properties that may be affected by HUD-funded programs will be evaluated by KKCP for National Register eligibility in consultation with the SHPO. KKCP staff will submit a location map, current photographs, and any historical information gathered on the properties to SHPO staff. If the SHPO's opinion is not rendered within 30 days of the submission of adequate documentation, it will be assumed that the SHPO is in agreement with KKCP's determination of eligibility. In the event that the City and the SHPO cannot agree on the eligibility of a property, the City will request a determination of eligibility from the Keeper of the National Register of Historic Places in accordance with 36 CFR 800.3. Documentation on all determinations will be retained by the City and will be available to the SHPO.

3. Treatment

Above-ground properties that KKCP and the SHPO agree are eligible, determined to be eligible, nominated, or listed in the National Register will be treated in the manner listed below. KKCP will review each activity to determine if the property lies within a National Register historic district or a locally designated historic or neighborhood conservation zoning district.

REHABILITATION

(a) The City will rehabilitate properties in accordance with The Secretary of the Interior's "Standards for the Rehabilitation of and Guidelines for Rehabilitating Historic Buildings" (36 CFR 67.7) (hereafter "Standards").

(b) City of Knoxville Community Development, the City entity that administers the HUD programs, will supervise all rehabilitation. All documentation, including work write-ups, bid documents, architectural plans, and photographs taken prior to the start of rehabilitation, will be reviewed by a professional with training and experience in

rehabilitation supervision of historic properties and the application of the Standards to ensure conformance. This professional will be an employee of KKCP. The SHPO will have the right to review and approve the credentials of that employee in accordance with the qualifications published in Appendix A to 36 CFR Part 61.

(c) City staff will send a request for preliminary review to KKCP for rehabilitation projects involving all buildings that are at least 45 years old or are within a local historic or neighborhood conservation zoning overlay district. KKCP staff will review the proposed scope of work to determine if it meets the activities included in the below list of "Activities Exempt from Further Review."

(d) If the proposed scope of work is included on the below list of "Activities Exempt from Further Review," KKCP staff may determine that the work does not require further consultation with the SHPO.

(e) On properties at least 45 years old, all rehabilitation work not included in the below list of "Activities Exempt from Further Review" will be submitted to the SHPO for review within the procedures set forth at 36 CFR Part 800 of the Council's regulations.

(f) For rehabilitation work not included in the list of excluded activities (Stipulation 5), on all properties determined eligible for or listed on the NRHP, the City will consult with the SHPO and initiate the procedures set forth at 36 CFR Part 800.5 of the Council's regulations. If KKCP has received a determination of not eligible for a resource, no further review is required provided that the SHPO issued that determination within the past ten (10) years and no new information has come to light.

(g) The documentation for each rehabilitation project will be retained by the City as part of the permanent project files and will be reviewed by the SHPO on an agreed-upon periodic basis.

NEW CONSTRUCTION

(a) The City will require designs for buildings slated for new construction within or adjacent to historic districts either listed on, or eligible for, the National Register or adjacent to properties that are individually eligible for or listed in the National Register to adhere to the Standards and be compatible with the overall character of the historic district or adjacent historic properties in terms of height, scale, massing, setback, color, materials, and details. Preliminary plans will be submitted to the SHPO for approval.

(b) The final design will be consistent with the preliminary plans approved by the SHPO, as modified to address any SHPO recommendations. If the plans cannot be modified and the SHPO determines there is an adverse effect, then the City will follow the steps laid out in 36 CFR 800.6 to resolve the adverse effects. If the City disagrees with the SHPO concerning the determination of an adverse effect, then the City will request the Council's comments in accordance with 36 CFR 800.5(c)(3)(i).

(c) Additions to structures that are eligible for or listed on the National Register of Historic Places, whether individually or as part of a historic district, will adhere to the Standards and be consistent with guidelines in the National Park Service's Preservation Brief #14, "New Exterior Additions to Historic Buildings: Preservation Concerns." Prior to beginning construction, all plans and drawings will be submitted to the SHPO for review and approval.

DEMOLITION

- (a) The City will send all demolition proposals to KKCP for review and comment.
- (b) KKCP will review the property for age and evaluate potential National Register eligibility and render a formal determination to the City and the SHPO.
- (c) City staff will submit to the SHPO for review all proposed demolitions consult with the SHPO pursuant to the requirements of 36 CFR Part 800.

4. Training

The SHPO will provide training in the application of the Standards for City personnel, and other personnel as requested by the City, on a schedule to be arranged between the parties.

5. Activities Exempt from Further Review

If the City determines that program activities will involve properties less than forty-five (45) years old and not eligible under Criteria Consideration G of the National Register, no further review is required, including evaluation of the property for National Register eligibility.

For the purposes of the following stipulation, "in-kind" means "installation of a new element that duplicates the material, dimensions, configuration, profile, and detailing of the original element."

In addition, for properties that are forty-five (45) years old or older, the below listed rehabilitation activities may not require further consultation with the SHPO. Information on each property over 45 years old and the proposed scope of work will be submitted to qualified KKCP staff. KKCP staff will review the property and scope of work and determine the property's National Register status using the above Identification process and determine if the proposed work qualifies as an activity exempt from further review. KKCP staff can recommend the City to initiate consultation with the SHPO pursuant to the requirements of 36 CFR 800 on a case-by-case basis:

- a) Exterior work, to include:
 - i. Electrical work (upgrading, repair, or in-kind replacement);
 - ii. Plumbing work (upgrading, repair, or in-kind replacement);

- iii. Repair or replacement of heating and ventilation systems where no structural alteration is involved;
- iv. Painting surfaces that have already been painted;
- v. Repair or replacement of roofs (when a potential health and safety hazard exists), gutters, porch elements, or cornices, when the repair or replacement is done in-kind to match existing material and form;
- vi. Caulking;
- vii. Repair to an existing accessibility ramp;
- viii. Reconstruction of an existing accessibility ramp provided that the reconstruction is in-kind and does not cause any new ground disturbance;
- ix. Replacement of non-historic doors on non-character-defining elevations;
- x. Repair to, or replacement of, non-historic screen doors;
- xi. Replacement of non-historic replacement windows that were replaced within the last forty (40) years;
- xii. Repair to historic windows;
- xiii. Modifications to driveways and sidewalks;
- xiv. In-kind repair of steps

b) Interior work, to include:

- i. Weatherization activities, including weather-stripping, roof insulation, and Insulation of basements and interior walls;
- ii. Interior surface treatments, including repainting, refinishing, repapering or installing carpet or linoleum, provided no original feature significant to the historic character of the structure is altered or lost;
- iii. Repair to flooring;
- iv. Repair of plaster walls and ceilings by patching plaster where possible, and replacement of interior deteriorated plaster with drywall, provided plaster does not have original decorative details;
- v. Replacement of original lighting fixtures for safety or efficiency, when those fixtures are not character-defining features;
- vi. Replacement of damaged interior doors that are not character-defining features with replacement doors similar in design and size;
- vii. Accessibility modifications, including widening of interior doors (when widening doors does not alter character-defining floor plans; or damage or remove any historic interior features), lowering kitchen and bathroom counters;
- viii. Replacements to toilets, bathtubs, shower valves, faucets, and similar bathroom fixtures, and associated plumbing;
- ix. Replacements to bathroom fixtures provided no alterations are needed to the floor plan or structure of the building;
- x. Replacement of kitchen fixtures provided no alterations are needed to the floor plan or structure of building.

6. Ground-Disturbing Activities

Ground-disturbing activities include, but are not limited to, utility excavation, new construction, excavation for footing or foundation repair, pond excavation, clearing for demolition, and extensive landscaping.

If ground disturbing activities are proposed by the City, other than in-place repair or replacement of existing water and sewer lines in the same location or areas documented to have been previously disturbed, the City will consult with the SHPO prior to any such activity to determine if the activity has the potential to affect National Register-listed or -eligible properties. If such potential exists, the City will conduct an archaeological survey in accordance with 36 CFR Part 66, Appendices B and C. The report will then be submitted to the SHPO for its review and comment. If archaeological resources are identified which meet the National Register criteria, they will be avoided or preserved in place wherever feasible. If this is not feasible, the SHPO will be consulted and a treatment program consistent with the Council's handbook "Treatment of Archaeological Properties" and approved by the SHPO will be developed and implemented.

7. Public Involvement

Each year through its Annual Action Plan process, which is made available for public inspection, the City will notify the public of: general information on HUD programs, amounts of available HUD funding, the types of activities proposed, and how interested persons can receive further information on the Programs. Projects and activities that require consultation or mitigation under this Programmatic Agreement will require the City to publish a Notice of Intent (NOI) to Request Release of Funds (RROF) from HUD, which includes a public comment period and is available for inspection, and an Obtaining Authority to Use Grant Funds (HUD Form 7015.16) from HUD. Documentation will be made available to the public via hard copy and online.

8. Post-Review Discoveries

The City and KKCP will comply with the post-review discovery requirements defined in 36 CFR 800.13. If a post-review discovery is made, the City and KKCP will coordinate with the SHPO to evaluate discoveries as needed and determine next steps.

9. Emergency Situations

If an emergency situation arises, the City and KKCP will comply with the requirements defined in 36 CFR 800.12. The City and KKCP will coordinate with the SHPO in the event of an emergency situation.

10. Monitoring

The Council and the SHPO may monitor activities carried out pursuant to this Agreement, and the Council will review such activities if so requested. The City will

cooperate with the Council and the SHPO in carrying out their monitoring and review responsibilities.

Throughout this agreement, unless otherwise stated, the SHPO shall have thirty (30) days to review and comment on all submittals from City concerning activities covered under this agreement document. Comments received from the SHPO shall be taken into consideration in preparing final plans. City will supply copies of its final findings to the other signatories.

An annual report will be prepared by KKCP and City staff detailing the reviews conducted under the Programmatic Agreement. The annual report will coincide with the end of the City's fiscal year and will be delivered to the SHPO no later than June 30 of each year.

11. Amendments/Termination

Signatories may propose an amendment to this agreement at any time. Signatories to this agreement may then agree to amend the terms of the agreement document. Such amendment shall be effective upon the signatures of all signatories to this agreement document, and the amendment shall be appended to the agreement document as an attachment.

This agreement will be reviewed annually at the receipt of the annual report. If any signatory determines that the terms of this agreement cannot be or are not being carried out, the signatories shall consult to seek amendment of the agreement. If the agreement is not amended, any signatory may terminate it upon providing the other signatories thirty (30) days written notice.

12. Copies

The agency official shall provide each consulting party with a copy of the executed agreement.

13. Dispute Resolution

Should any signatory object in writing within time frames established by this PA to any plans, specifications, determinations, or other activities undertaken pursuant to this PA, the City shall consult with that party, and any other party, to resolve the objection. If the objection is resolved within 14 days, the parties will proceed accordingly. If the City determines within this time frame that the objection cannot be resolved through consultation, the City will request comments from the ACHP pursuant to 36 CFR 800.2(b)(2). The City will take into account any ACHP comments received within 30 days after ACHP receipt of the request, with reference only to the subject in dispute. The signatories are responsible for implementing all actions of this PA that are not subject to dispute. City will promptly provide the other parties with a written resolution.

14. Duration

This Programmatic Agreement will continue in force and effect until five (5) years after the date of the last signature. At that time, it will be reviewed by the Signatories to consider an extension, modification, or termination of this Agreement. No extension or modification will be effective unless all Signatories to this Agreement have agreed to it in writing.

Execution of this Agreement among the Tennessee State Historic Preservation Office, the City of Knoxville, and Knoxville-Knox County Planning, and implementation of its terms evidence that the City has taken into account the effects of the undertaking on historic properties, and that the City has complied with its obligations under Section 106 of the National Historic Preservation Act.

APPROVED AS TO FORM:

By: Charles Swanson Date: 4-5-20
Charles Swanson, City of Knoxville Law Director

KNOXVILLE-KNOX COUNTY PLANNING:

By: Gerald Green Date: 4/30/2020
Gerald Green, Executive Director

CITY OF KNOXVILLE:

By: Indya Kincannon Date: 4-6-2020
Indya Kincannon, Mayor

TENNESSEE STATE HISTORIC PRESERVATION OFFICER:

By: E. Patrick McIntyre, Jr. Date: 05/05/2020
E. Patrick McIntyre, Jr., Tennessee State Historic Preservation Officer

**PROGRAMMATIC AGREEMENT
AMONG THE TENNESSEE STATE HISTORIC PRESERVATION OFFICER, KNOX
COUNTY, AND KNOXVILLE-KNOX COUNTY PLANNING, REGARDING KNOX
COUNTY, TENNESSEE PROGRAMS FUNDED BY THE U.S. DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT PURSUANT TO 36 CFR SECTION 800.6(a)**

WHEREAS, Knox County (County) administers the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Program, the Section 108 Loan Program, and any future United States Department of Housing and Urban Development (HUD) program funded activities (Programs); and

WHEREAS, the County is acting as the responsible entity in accordance with HUD's environmental regulations at 24 CFR Part 58.4 and as such, is responsible for compliance with section 106 of the National Historic Preservation Act; and

WHEREAS, the County has determined that the administration of the Programs may have an effect upon properties listed on or eligible for the National Register of Historic Places (National Register) and has consulted with the State Historic Preservation Officer (SHPO) and the Advisory Council on Historic Preservation (Council) pursuant to 36 CFR Part 800.1 of the Council's regulations implementing Section 106 of the National Preservation Act (16 U.S.C. 470f), and

WHEREAS, Knoxville-Knox County Planning (KKCP) maintains an ongoing survey in Knoxville and Knox County of districts, sites, buildings, structures, and objects (hereafter "properties") that may meet the criteria for listing in the National Register in accordance with the criteria for Determinations of Eligibility for Inclusion in the National Register of Historic Places [36 CFR 800.2 C (2)], and

NOW, THEREFORE, the SHPO, the County, and KKCP agree that the Programs shall be administered in accordance with the following stipulations to satisfy the County's Section 106 responsibilities for all individual undertakings of the Programs.

STIPULATIONS

The County will ensure that the following measures are carried out.

1. Professional Qualifications

The SHPO will review and approve the credentials of KKCP professional staff to confirm they meet the qualifications published in Appendix A to 36 CFR Part 61 and to ensure the application of the Standards.

2. Identification

The following stipulations for identification and treatment apply only to undertakings with no ground-disturbing activities.

The County will notify KKCP staff of all districts, sites, buildings, structures, and objects (hereafter "properties") that are forty-five (45) years old or older that are located within the boundaries of targeted priority neighborhoods and other project areas slated for Program activities. The County will provide current photographs of properties that are forty-five years old or older to KKCP staff. KKCP staff (meeting the qualifications published in Appendix A to 36 CFR Part 61) will confirm the properties' age and survey the properties at the reconnaissance level. KKCP will be responsible for maintaining current information on local historic zoning overlays, NRHP listings, and neighborhood information as needed. KKCP will consult survey files; GIS maps documenting past historic resource surveys, local zoning overlays and NRHP sites; and also survey at the reconnaissance level the surrounding neighborhood context.

Properties that may be affected by HUD-funded programs will be evaluated by KKCP for National Register eligibility in consultation with the SHPO. KKCP staff will submit a location map, current photographs, and any historical information gathered on the properties to SHPO staff. If the SHPO's opinion is not rendered within 30 days of the submission of adequate documentation, it will be assumed that the SHPO is in agreement with KKCP's determination of eligibility. In the event that the County and the SHPO cannot agree on the eligibility of a property, the County will request a determination of eligibility from the Keeper of the National Register of Historic Places in accordance with 36 CFR 800.3. Documentation on all determinations will be retained by the County and will be available to the SHPO.

3. Treatment

Above-ground properties that KKCP and the SHPO agree are eligible, determined to be eligible, nominated, or listed in the National Register will be treated in the manner listed below. KKCP will review each activity to determine if the property lies within a National Register historic district or a locally designated historic or neighborhood conservation zoning district.

REHABILITATION

(a) The County will rehabilitate properties in accordance with The Secretary of the Interior's "Standards for the Rehabilitation of and Guidelines for Rehabilitating Historic Buildings" (36 CFR 67.7) (hereafter "Standards").

(b) Knox County Community Development, the County entity that administers the HUD programs, will supervise all rehabilitation. All documentation, including work write-ups, bid documents, architectural plans, and photographs taken prior to the start of rehabilitation, will be reviewed by a professional with training and experience in rehabilitation supervision of historic properties and the application of the Standards to ensure conformance. This professional will be an employee of KKCP. The SHPO will have the right to review and approve the credentials of that employee in accordance with the qualifications published in Appendix A to 36 CFR Part 61.

(c) County staff will send a request for preliminary review to KKCP for rehabilitation projects involving all buildings that are at least 45 years old or are within a local historic or neighborhood conservation zoning overlay district. KKCP staff will review the proposed scope of work to determine if it meets the activities included in the below list of "Activities Exempt from Further Review."

(d) If the proposed scope of work is included on the below list of "Activities Exempt from Further Review," KKCP staff may determine that the work does not require further consultation with the SHPO.

(e) On properties at least 45 years old, all rehabilitation work not included in the below list of "Activities Exempt from Further Review" will be submitted to the SHPO for review within the procedures set forth at 36 CFR Part 800 of the Council's regulations.

(f) For rehabilitation work not included in the list of excluded activities (Stipulation 5), on all properties determined eligible for or listed on the NRHP, the County will consult with the SHPO and initiate the procedures set forth at 36 CFR Part 800.5 of the Council's regulations. If KKCP has received a determination of not eligible for a resource, no further review is required provided that the SHPO issued that determination within the past ten (10) years and no new information has come to light.

(g) The documentation for each rehabilitation project will be retained by the County as part of the permanent project files and will be reviewed by the SHPO on an agreed-upon periodic basis.

NEW CONSTRUCTION

(a) The County will require designs for buildings slated for new construction within or adjacent to historic districts either listed on, or eligible for, the National Register or adjacent to properties that are individually eligible or listed in the National Register to adhere to the Standards and be compatible with the overall character of the historic district or adjacent historic properties in terms of height, scale, massing, setback, color, materials, and details. Preliminary plans will be submitted to the SHPO for approval.

(b) The final design will be consistent with the preliminary plans approved by the SHPO, as modified to address any SHPO recommendations. If the plans cannot be modified and the SHPO determines there is an adverse effect, then the County will follow the steps laid out in 36 CFR 800.6 to resolve the adverse effects. If the County disagrees with the SHPO concerning the determination of an adverse effect, then the County will request the Council's comments in accordance with 36 CFR 800.5(c)(3)(i).

(c) Additions to structures that are eligible for or listed on the National Register of Historic Places, whether individually or as part of a historic district, will adhere to the

Standards and be consistent with guidelines in the National Park Service's Preservation Brief #14, "New Exterior Additions to Historic Buildings: Preservation Concerns." Prior to beginning construction, all plans and drawings will be submitted to the SHPO for review and approval.

DEMOLITION

- (a) The County will send all demolition proposals to KKCP for review and comment.
- (b) KKCP will review the property for age and evaluate potential National Register eligibility and render a formal determination to the County and the SHPO.
- (c) County staff will submit to the SHPO for review all proposed demolitions, and consult with the SHPO pursuant to the requirements of 36 CFR Part 800.

4. Training

The SHPO will provide training in the application of the Standards for County personnel, and other personnel as requested by the County, on a schedule to be arranged between the parties.

5. Activities Exempt from Further Review

If the County determines that program activities will involve properties less than forty-five (45) years old and not eligible under Criteria Consideration G of the National Register, no further review is required, including evaluation of the property for National Register eligibility.

For the purposes of the following stipulation, "in-kind" means "installation of a new element that duplicates the material, dimensions, configuration, profile, and detailing of the original element."

In addition, for properties that are forty-five (45) years old or older, the below listed rehabilitation activities may not require further consultation with the SHPO. Information on each property over 45 years old and the proposed scope of work will be submitted to qualified KKCP staff. KKCP staff will review the property and scope of work and determine the property's National Register status using the above Identification process and determine if the proposed work qualifies as an activity exempt from further review. KKCP staff can recommend the County to initiate consultation with the SHPO pursuant to the requirements of 36 CFR 800 on a case-by-case basis.

- a) Exterior work, to include:
 - i. Electrical work (upgrading, repair, or in-kind replacement);
 - ii. Plumbing work (upgrading, repair, or in-kind replacement);
 - iii. Repair or replacement of heating and ventilation systems where no structural alteration is involved;

- iv. Painting surfaces that have already been painted;
- v. Repair or replacement of roofs (when a potential health and safety hazard exists), gutters, porch elements, or cornices, when the repair or replacement is done in-kind to match existing material and form;
- vi. Caulking;
- vii. Repair to an existing accessibility ramp;
- viii. Reconstruction of an existing accessibility ramp provided that the reconstruction is in-kind and does not cause any new ground disturbance;
- ix. Replacement of non-historic doors on non-character-defining elevations;
- x. Repair to, or replacement of, non-historic screen doors;
- xi. Replacement of non-historic, replacement windows that were replaced within the last forty (40) years;
- xii. Repair to historic windows;
- xiii. Modifications to driveways and sidewalks;
- xiv. In-kind repair of steps.

b) Interior work, to include:

- i. Weatherization activities, including weather-stripping, roof insulation, and Insulation of basements and interior walls;
- ii. Interior surface treatments, including repainting, refinishing, repapering or installing carpet or linoleum, provided no original feature significant to the historic character of the structure is altered or lost;
- iii. Repair to flooring;
- iv. Repair of plaster walls and ceilings by patching plaster where possible, and replacement of interior deteriorated plaster with drywall, provided plaster does not have original decorative details;
- v. Replacement of original lighting fixtures for safety or efficiency, when those fixtures are not character-defining features;
- vi. Replacement of damaged interior doors that are not character-defining features with replacement doors similar in design size;
- vii. Accessibility modifications, including widening of interior doors (when widening doors does not alter character-defining floor plans; or damage or remove any historic interior features), lowering kitchen and bathroom counters;
- viii. Replacements to toilets, bathtubs, shower valves, faucets, and similar bathroom fixtures, and associated plumbing;
- ix. Replacements to bathroom fixtures provided no alterations are needed to the floor plan or structure of the building;
- x. Replacement of kitchen fixtures provided no alterations are needed to the floor plan or structure of the building.

6. Ground-Disturbing Activities

Ground-Disturbing activities include, but are not limited to, utility excavation, new construction, excavation for footing or foundation repair, pond excavation, clearing for demolition, and extensive landscaping.

If ground disturbing activities are proposed by the County, other than in-place repair or replacement of existing water and sewer lines in the same location or areas documented to have been previously disturbed, the County will consult with the SHPO prior to any such activity to determine if the activity has the potential to affect National Register-listed or -eligible properties. If such potential exists, the County will conduct an archaeological survey in accordance with 36 CFR Part 66, Appendices B and C. The report will then be submitted to the SHPO for its review and comment. If archaeological resources are identified which meet the National Register criteria, they will be avoided or preserved in place wherever feasible. If this is not feasible, the SHPO will be consulted and a treatment program consistent with the Council's handbook "Treatment of Archaeological Properties" and approved by the SHPO will be developed and implemented.

7. Public Involvement

Each year the County will notify the public of the County's current Program, and make available for public inspection documentation on the County's Program. Included in this documentation will be general information on the Program; information on the type(s) of activities undertaken with CDBG or HUD funds; information on identified historic properties which might be affected by these activities; the amount of CDBG or HUD funds available in the current program year; and how interested persons can receive further information on the Program. Documentation will be made available to the public via hard copy at the Community Development office and online.

8. Post-Review Discoveries

The County and KCCP will comply with the post-review discovery requirements defined in 36 CFR 800.13. If a post-review discovery is made, the County and KKCP will coordinate with the SHPO to evaluate discoveries as needed and determine next steps.

9. Emergency Situations

If an emergency situation arises, the County and KKCP will comply with the requirements defined in 36 CFR 800.12. The County and KKCP will coordinate with the SHPO in the event of an emergency situation.

10. Monitoring

The Council and the SHPO may monitor activities carried out pursuant to this Agreement, and the Council will review such activities if so requested. The County will cooperate with the Council and the SHPO in carrying out their monitoring and review responsibilities.

Throughout this agreement, unless otherwise stated, the SHPO shall have thirty (30) days to review and comment on all submittals from County concerning activities covered under this agreement document. Comments received from the SHPO shall be taken into

consideration in preparing final plans. County will supply copies of its final findings to the other signatories.

An annual report will be prepared by KKCP and County staff detailing the reviews conducted under the Programmatic Agreement. The annual report will coincide with the end of the County's fiscal year and will be delivered to the SHPO no later than June 30 of each year.

11. Amendments/Termination

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an extension, modification, or termination of this Agreement. No extension or modification will be effective unless all Signatories to this Agreement have agreed to it in writing.

Execution of this Agreement among the Tennessee State Historic Preservation Office, Knox County, Knoxville-Knox County Planning, and implementation of its terms evidence that the County has taken into account the effects of the undertaking on historic properties, and that the County has complied with its obligations under Section 106 of the National Historic Preservation Act.

KNOXVILLE-KNOX COUNTY PLANNING:

By: Gerald Green Date: 4/30/2020
Gerald Green, Executive Director

KNOX COUNTY, TENNESSEE:

By: Glenn Jacobs Date: 4/8/2020
Glenn Jacobs, Mayor

TENNESSEE STATE HISTORIC PRESERVATION OFFICER:

By: E. Patrick McIntyre, Jr. Date: 05/05/2020

E. Patrick McIntyre, Jr., Tennessee State Historic Preservation Officer

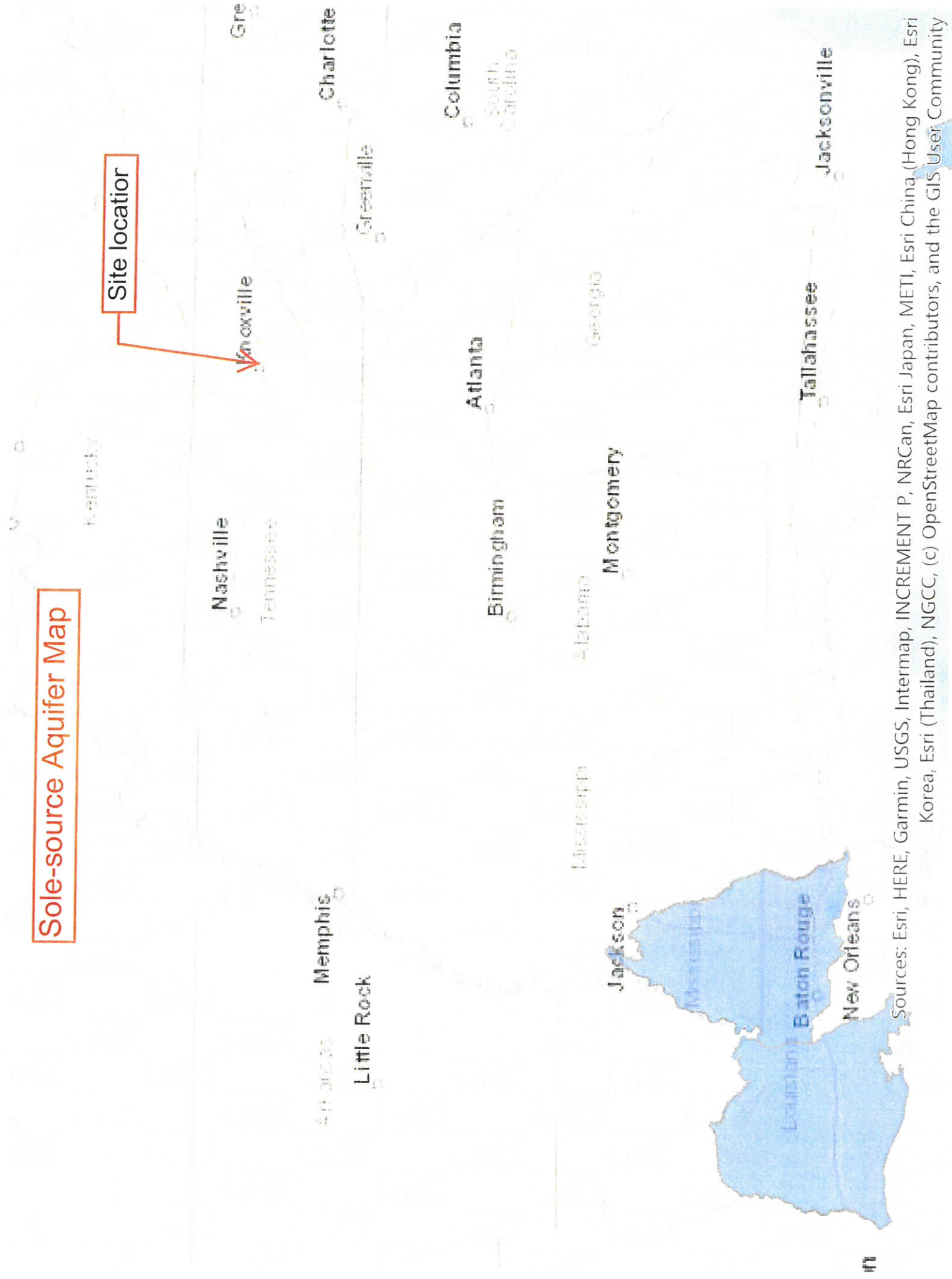
Contract No.: 20-170

APPROVED AS TO LEGAL FORM

Richard B. Remington, Jr. for CFS
Knox County Law Director Date: 5

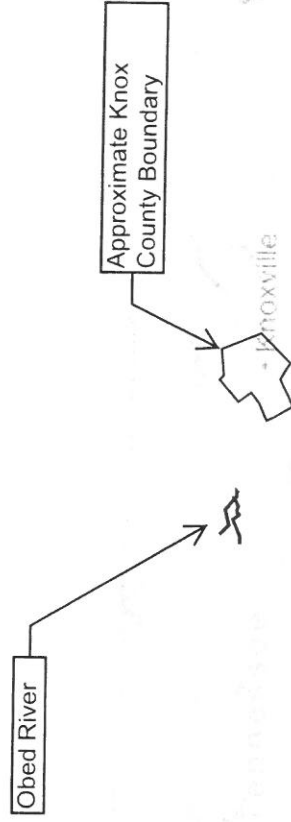
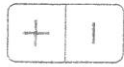
Sole-source Aquifer Map

Site location



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

National Wild and Scenic River: The Obed



APPENDIX B

ENVIRONMENTAL REVIEW FORMS

Site Specific Checklist

Project Name/Address: _____

Project Description: _____

Date of Completed Review: _____

Site Inspector's Signature: _____

		YES	NO
1	Does the proposed site contain a building over 50 years old, demolition, or new construction? If "Yes" the SHPO must be consulted.		
2	Is the proposed site located within a 100-year floodplain?		
3	(If the project consists of increasing residential densities, converting the type of use of a building to habitation, or making a vacant building habitable) Is the project planned within 1-mile of an above ground storage tank (100-gallon capacity or greater)?		
4	Does the proposed project consist of new construction? If yes, proceed to number 5. If no, items 5 – 9 are not applicable.		
5	Is the proposed site undisturbed?		
6	Is the proposed site located on wetlands according to TWRA Wetland Inventory Maps? If Yes, the HUD 8-Step Decision Making Process applies.		
7	Will the proposed site affect potentially agricultural property?		
8	Is the proposed site located within 1,000 feet of any major highway, 3,000 feet of any railroad, 15 miles of a major civilian airport, or 15 miles of a military airport?		
9	Is the proposed site located on or near properties with hazardous or toxic materials?		

If any of the answers to the above questions are YES, see next page for instructions.

If all answers to the above questions are NO, file Site Specific Checklist with documentation supporting answers (see Section 3.4 of this report for guidance)

If a project has potential environmental concerns not listed above, please contact the Environmental Consultant for further guidance.

Site Specific Checklist, continued

1.	Regulation:	Historic Properties – Section 106 (36 CFR 800)
	Action:	Submit to MPC and SHPO photographs of the existing structure and a description of the proposed improvements. The MPC must approve the proposed improvements as in conformance with the Secretary of Interior Standards for Rehabilitation before the project can proceed. If new construction or demolition, determination of the MPC and documentation will be sent to the SHPO for review.
	Contact:	Knoxville MPC and SHPO
2.	Regulation:	Floodplain – Executive Order 11988
	Action:	Confirm on the latest FEMA floodplain maps that the proposed project is not located within a floodplain. Projects located within a floodplain: 1) are subject to Executive Order 11988 (Floodplain Management) and HUD's implementing regulations at 24 CFR Part 55--Floodplain Management; 2) the community must participate in FEMA's National Flood Insurance Program and 3) the property owner must maintain flood insurance. See: http://www.hud.gov/offices/cpd/environment/review/floodplain.cfm
	Contact:	http://msc.fema.gov
3.	Regulation:	24 CFR 51C
	Action:	Conduct analyses using the handbook Siting of HUD-Assisted Projects Near Hazardous Facilities, choose alternative site, or reject project. If yes, calculate the acceptable separation distance per guidebook (HUD-1060-CPD), "Siting of HUD-Assisted Projects Near Hazardous Facilities" and apply appropriate mitigation measures or reject the site. (http://www.hud.gov/offices/cpd/environment/training/guidebooks/hazfacilities/)
	Contact:	HUD Region 4, Knoxville Field Office
5.	Regulation:	Archaeological Resources
	Action:	Submit to MPC a USGS topographic map indicating the location of the proposed project. The MPC must approve the proposed disturbance before the project can proceed. Additionally, for new construction or demolition, the SHPO will review the proposed project.
	Contact:	Knoxville MPC
6.	Regulation:	Wetlands – Section 10 of Executive Order 11990
	Action:	Confirm that the proposed project will not disturb any wetlands, as defined on the National Wetland Inventory Maps.
	Contact:	http://www.fws.gov/wetlands/ US FWS Field Office, Crossville, TN
7.	Regulation:	Farmlands – Farmland Protection Policy Act of 1981
	Action:	Confirm with the local NRCS field office that the project will not affect important farmland.
	Contact:	NRCS Knoxville Field Office
8.	Regulation:	Noise – HUD 24 CFR 51.10
	Action:	Conduct a noise study to determine if the proposed site is located within Normally Unacceptable noise levels (>65-75 DNL) or Unacceptable noise levels (>75DNL).
	Contact:	HUD Region 4, Knoxville Field Office
9.	Regulation:	24 CFR 58.5(i)(2)
	Action:	Consider conducting a Phase I Environmental Site Assessment (ESA) per the American Society for Testing and Materials (ASTM) E1527-13 standard.
	Contact:	Environmental Consultant



**U.S. Department of Housing and Urban
Development**

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

**Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR Part 58.34(a) and 58.35(b)**

Project Information

Project Name:

Responsible Entity:

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer:

Certifying Officer Name and Title:

Consultant (if applicable):

Project Location:

Description of the Proposed Project [24 CFR 58.32; 40 CFR 1508.25]:

Level of Environmental Review Determination:

☐ Activity/Project is Exempt per 24 CFR 58.34(a): _____

☐ Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b):

Project Name

Project Locality and State

HEROS Number

Funding Information

Grant Number	HUD Program	Funding Amount

Estimated Total HUD Funded Amount:

This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

Compliance with 24 CFR §50.4 and §58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4 and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.6		
Airport Runway Clear Zones and Accident Potential Zones 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input type="checkbox"/>	

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

Preparer Signature: _____ Date: _____

Name/Title/Organization: _____

Responsible Entity Agency Official Signature:

_____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
www.hud.gov

espanol.hud.gov

**Environmental Review for Activity/Project that is Categorically
Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name:

Responsible Entity:

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer:

Certifying Officer Name and Title:

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to:

Project Location:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: _____

Funding Information

Grant Number	HUD Program	Funding Amount

Estimated Total HUD Funded Amount:

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input type="checkbox"/>	

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Sole Source Aquifers	Yes No <input type="checkbox"/> <input type="checkbox"/>	

Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> <input type="checkbox"/>	
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input type="checkbox"/>	
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input type="checkbox"/>	
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input type="checkbox"/>	

Field Inspection (Date and completed by):

Summary of Findings and Conclusions:

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

Determination:

- ☐ This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at

§58.5. **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR

- ☐ This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- ☐ This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: _____ Date: _____

Name/Title/Organization: _____

Responsible Entity Agency Official Signature:

_____ Date: _____

Name/Title: _____

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet is designed to be used by those "Partners" (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. This document should be submitted along with the Related Law and Authority worksheets documenting compliance with the environmental requirements listed at 24 CFR 50.4 and 58.5-6.

Environmental Assessment Factors and Analysis

This format may be used to submit information for Part 50 or Part 58 reviews.

Complete this form only if an Environmental Assessment¹ is anticipated.

***Environmental Assessment Factors** [Ref. 40 CFR 1508.8 & 1508.27]

In the table below, describe the effects of the proposal on the character, features and resources of the project area. Evaluate and document each factor as appropriate and in proportion to its relevance to the proposed action. Provide credible, traceable, and supportive source documentation as appropriate. Identify any conditions, attenuation, or mitigation measures.

Environmental Assessment Factor	Impact Evaluation
LAND DEVELOPMENT	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	
Hazards and Nuisances including Site Safety and Noise	
Energy Consumption	
SOCIOECONOMIC	
Employment and Income Patterns	
Demographic Character Changes, Displacement	
COMMUNITY FACILITIES AND SERVICES	

¹ Environmental Assessments are required for projects that are not categorically excluded under 24 CFR 50.19-50.20 or 24 CFR 58.34-58.35. These are typically required for larger projects including new construction, major rehabilitation, or conversion. The responsible entity (for Part 58 reviews) or HUD (for Part 50 reviews) will determine the level of review for the proposed project. Projects that are categorically excluded or exempt from the National Environmental Policy Act need not complete any of this form from Environmental Assessment Factors on.

Educational and Cultural Facilities	
Commercial Facilities	
Health Care and Social Services	
Solid Waste Disposal / Recycling	
Waste Water / Sanitary Sewers	
Water Supply	
Public Safety - Police, Fire and Emergency Medical	
Parks, Open Space and Recreation	
Transportation and Accessibility	
NATURAL FEATURES	
Unique Natural Features, Water Resources	
Vegetation, Wildlife	
Other Factors	

***Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

The underlying purpose and need to which the agency is responding in proposing the action and its alternatives. Describe how the proposed action is intended to address housing and/or community development needs.

[Click here to enter text](#)

***Existing Conditions and Trends:**

Determine existing conditions and describe the character, features, and resources of the project area and its surroundings; identify the trends that are likely to continue in the absence of the project.

[Click here to enter text](#)

***Cumulative Impact Analysis:**

Identify below the cumulative impact on the environment that will result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.

[Click here to enter text](#)

Alternatives:

Identify below other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Include the benefits and adverse impacts to the environment of each alternative, and the reasons (e.g., economic, engineering, or others) for rejecting it.

[Click here to enter text.](#)

***No Action Alternative:**

Identify below the "no action" alternative, describing the most likely conditions expected to exist in the future in the absence of the implementation of any action.

[Click here to enter text.](#)

Additional Studies Performed:

[Click here to enter text.](#)

Field Inspection (Date and completed by):

[Click here to enter text.](#)

List of Sources, Agencies and Persons Consulted:

[Click here to enter text.](#)

List of Permits Obtained:

Provide a list of permits, reviews, and approvals that are required for project construction.

[Click here to enter text.](#)

Request for Release of Funds and Certification

U.S. Department of Housing
and Urban Development
Office of Community Planning
and Development

OMB No. 2506-0087
(exp. 03/31/2020)

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s)	2. HUD/State Identification Number	3. Recipient Identification Number (optional)
4. OMB Catalog Number(s)	5. Name and address of responsible entity	
6. For information about this request, contact (name & phone number)		
8. HUD or State Agency and office unit to receive request	7. Name and address of recipient (if different than responsible entity)	

The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following

9. Program Activity(ies)/Project Name(s)	10. Location (Street address, city, county, State)
11. Program Activity/Project Description	

Part 2. Environmental Certification (to be completed by responsible entity)

With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did ☐ did not ☐ require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.
6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.
7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.

As the duly designated certifying official of the responsible entity, I also certify that:

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.
9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity.

Signature of Certifying Officer of the Responsible Entity	Title of Certifying Officer
	Date signed

X

Address of Certifying Officer

Part 3. To be completed when the Recipient is not the Responsible Entity

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient	Title of Authorized Officer
	Date signed

X

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

SUMMARY OF LEVELS OF ENVIRONMENTAL REVIEW & DOCUMENTATION REQUIRED IN ERR

LEVEL OF ENVIRONMENTAL REVIEW				rev. 1-27-2010	
58.34 Exempt	58.35(b) Categorically Excluded NOT subject to 58.5	58.35(a) Categorically Excluded AND subject to 58.5 "A" checked for all on Statutory Worksheet*	58.35(a) Categorically Excluded AND "B" checked for one or more on Statutory Worksheet*	58.36 NEPA Environmental Assessment	
TYPE OF ACTIVITIES					
Environmental and other studies	Tenant-based rental assistance	Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are already in place and will be retained in the same use without change in size or capacity of more than 20% <ul style="list-style-type: none"> Replacement of water or sewer lines Reconstruction of curbs & sidewalks repaving of streets Special projects directed toward the removal of material and architectural barriers that restrict the mobility of and accessibility to the elderly and handicapped.	Activities not exempt or categorically excluded <p>Generally, new construction of 5 or more homes, and conversion from one type of land use to another.</p>		
Resource Identification	Supportive services such as health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent, mortgage or utilities, assistance in gaining access to government benefits.	Single Family Housing Rehab <ul style="list-style-type: none"> Unit density is not increased beyond 4 units Project doesn't involve change in land use from residential to non-residential The footprint of the building is not increased in a floodplain or a wetland. Multifamily Housing Rehab <ul style="list-style-type: none"> Unit density change is not more than 20% Project doesn't involve change in land use from residential to non-residential Cost of rehabilitation is less than 75% of the estimated cost of replacement after rehab Non-Residential Structures <ul style="list-style-type: none"> Facilities and improvements were in place and will not be changed in size or capacity by more than 20%. Activity does not involve change in land use from non-residential to residential, commercial to industrial, or one industrial use to another Individual action (e.g., disposition, new construction, demolition, acquisition) on a 1 to 4 family dwelling, or individual action on five or more units scattered on sites more than 2000 feet apart and no more than 4 units per site.			
Development of plans and strategies	Operating costs including maintenance, furnishings, security, equipment, operation, supplies, utilities, staff training and recruitment	Acquisition (including leasing) or disposition of, or equity loans on an existing structure or acquisition (including leasing) of vacant land provided that the structure or land acquired or disposed of will be retained for the same use.			
Information and financial services	Economic development activities including equipment purchase, inventory financing, interest subsidy, operating costs, and other expenses not associated with construction or expansion	Combinations of the above activities			
Administrative and Management Activities	Activities to assist homeownership of existing dwelling units or units under construction, including closing costs and down payment assistance to homebuyers, interest buy downs or other actions resulting in transfer of title.	Complete Statutory Worksheet (sec. 58.5) and indicate converts exempt	Complete Statutory Worksheet (sec. 58.5) NOI/RROF notification RROF & Certification (form 7015.15) Authority to Use Grant Funds (form 7015.16)	Environmental Assessment (including Statutory Checklist)* FONSI and NOI/RROF notification Form 7015.15 Form 7015.16	
Public services, i.e., employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation, welfare, recreational needs	Affordable housing pre-development costs: legal consulting, developer and other site-option costs, project financing, administrative costs for loan commitments, zoning approvals, and other activities which don't have a physical impact.	Also, determine compliance with 58.6 <ul style="list-style-type: none"> NFIP CBRA Runway Clear Zones 	Also, determine compliance with 58.6 <ul style="list-style-type: none"> National Flood Insurance Program Coastal Barrier Resource Act Runway Clear Zones 	Also, determine compliance with 58.6	
Inspections and testing for hazards or defects	Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under Part 58, if approval is by same the RE, and re-evaluation is not required, per 58.47	Also, determine compliance with 58.6 <ul style="list-style-type: none"> National Flood Insurance Program (NFIP) Coastal Barrier Resource Act (CBRA) Runway Clear Zones 	Also, determine compliance with 58.6 <ul style="list-style-type: none"> NFIP CBRA Runway Clear Zones 	Also, determine compliance with 58.6	
Purchase insurance and tools					
Engineering or design costs					
Technical assistance and training					
Temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair or restoration activities to control or arrest the effects from disasters or imminent threats to public safety, including those resulting from physical deterioration.					
Payments of principal and interest on loans or obligations guaranteed by HUD					
DOCUMENTATION REQUIRED IN ERR					
Describe activity and make a written determination of exemption.	Describe activity and make a written 58.35(b) determination.	Complete Statutory Worksheet (sec. 58.5) and indicate converts exempt	Complete Statutory Worksheet (sec. 58.5) NOI/RROF notification RROF & Certification (form 7015.15) Authority to Use Grant Funds (form 7015.16)	Environmental Assessment (including Statutory Checklist)* FONSI and NOI/RROF notification Form 7015.15 Form 7015.16	
Also, determine compliance with 58.6: <ul style="list-style-type: none"> National Flood Insurance Program Coastal Barrier Resource Act Runway Clear Zones 	Also, determine compliance with 58.6: <ul style="list-style-type: none"> National Flood Insurance Program (NFIP) Coastal Barrier Resource Act (CBRA) Runway Clear Zones 	Also, determine compliance with 58.6 <ul style="list-style-type: none"> NFIP CBRA Runway Clear Zones 	Also, determine compliance with 58.6 <ul style="list-style-type: none"> National Flood Insurance Program Coastal Barrier Resource Act Runway Clear Zones 	Also, determine compliance with 58.6	

*HUD recommended format

Adapted from chart prepared by Anchorage Office of Native American Programs, HUD

APPENDIX C

SITE-SPECIFIC OR TIER II REVIEWS

APPENDIX C: Site-Specific or Tier II Reviews

Update this document as site-specific reviews are completed. Complete each site-specific review according to the written strategies outlined in the broad-level review and attach it in the environmental review record.

[illegible]